UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20021-CR-GAYLES/GOODMAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERICK NTEKEREZE PRINCE,

Defendant.

<u>UNOPPOSED MOTION FOR MODIFICATION OF BOND CONDITIONS</u>

Comes now, the defendant, Erick Ntekereze Prince, by and through undersigned Counsel, and respectfully moves this Court to modify the bond conditions in this case and states the following:

- 1. On February 6, 2025, Magistrate Judge Eduardo Sanchez approved a stipulated personal surety bond in the amount of \$100,000. (DE 15).
- 2. The conditions of the bond for Mr. Prince, who resides in Brooklyn, New York, allowed for travel to New York State and the Southern District of Florida.
- 3. Mr. Prince travels to California as principal part of his business and is seeking a modification to allow him to continue to travel to California for business purposes.
- 4. Mr. Prince's brother and co-defendant, Emmanuel Ashtor, also recieved a \$100,000 personal surety bond. Mr. Ashtor's bond allows for travel to

North Carolina (where he currently resides), the Southern District of Florida, and California for business purposes.

- 5. Mr. Prince is now seeking a concomitant modification of the bond conditions that would allow him to travel to California for business purposes.
- 6. The requested modification is reasonable and necessary for Mr. Prince's business operations, and is consistent with the conditions granted to his codefendant.
- 7. Counsel for Mr. Prince has conferred with Assistant United States Attorney Jonathan Stratton, who has authorized counsel to represent that the government does not oppose this motion.

WHEREFORE, the defendant, Erick Ntekereze Prince, requests that the Court approve a bond modification to allow travel to California for business purposes.

Respectfully submitted,

HECTOR DOPICO FEDERAL PUBLIC DEFENDER

BY: s/Marisa R. Taney

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CERTIFICATE OF SERVICE

I HEREBY certify that on February 11, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Marisa Taney